Appln. No.: 09/364,370

Attorney Docket No.: A8494 IBM Docket No.: ST9-99-077

## **REMARKS**

These remarks, submitted in response to the Office Action dated May 16, 2006, are believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-31 are all the claims pending in the application.

## I. Claim Rejections under 35 U.S.C. § 102

Claims 1-9, 11-19, 21-29 and 31 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Jacobs (U.S. Patent No. 6,710,786). Applicants respectfully traverse the rejection since Jacobs does not disclose all the limitations in the claims in as complete detail as recited in the claims.

For example, Claim 1 recites an input object that contains input data and one input function. Claim 1 further recites that the one input function comprises computer-implemented programming instructions.

Applicants submit that Jacobs does not teach or suggest an input object that contains both input data and an input function that comprises computer-implemented programming instructions. In order to anticipate Claim 1 under 35 U.S.C. § 102, "the identical invention must be shown in as complete detail as is contained in the claim." (Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) cited in MPEP § 2131).

The Examiner asserts that the browser request in the form of a URL of Jacobs teaches the input object and the input function comprising computer-implemented programming instructions.

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(Office Action, Page 3). The Examiner further asserts that computer-implemented programming instructions are taught by Jacobs at column 2, lines 52-63. (Office Action, Page 7). However, this aspect of Jacobs discloses that the browser requests, the aspect cited as the input function, are processed by the receiving entity, but does not teach that the browser requests comprise computer-implemented programming instructions.

Applicants respectfully submit that Jacobs does not teach that the cited browser request contains computer-implemented programming instructions. Rather, Jacobs merely discloses that a browser request identifies a predefined operation contained on the receiving entity. (Jacobs, Col. 8, Ln. 65-67). The predefined operations contained on the receiving entity are referred to as cartridges, "modules of code for performing specific application or system functions." (Jacobs, Col. 7, Ln. 48-59). As such, Applicants respectfully submit that Jacobs does not teach that the browser request, the aspect cited as the input object, contains the operations to be performed by a programming entity. This is because the browser request merely identifies the predefined modules of code contained, not in the input object, but rather on the receiving entity. Further, Jacobs does not disclose the browser request containing an input function comprising computer-implemented programming instructions.

For at least the above reasons, Claim 1 and its dependent claims are not anticipated by Jacobs and should be deemed allowable. Since Claims 11 and 21 recite similar elements, Claims 11 and 21 and their dependent claims should also be deemed allowable for at least the same reasons.

RESPONSE UNDER 37 C.F.R. § 1.111

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II. Rejection of Claims 10, 20 and 30 under § 103(a)

Claims 10, 20 and 30 have been rejected under 35 U.S.C. § 103(a) as being unpatentable

over Jacobs in view of Nakai (USP 6,253,248). Claims 10, 20 and 30 should be deemed

allowable by virtue of their dependency to claims 1, 11 and 21 for the reasons set forth above,

since Nakai does not cure the deficiencies of Jacobs.

III. Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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Date: August 1, 2006

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